

# **EXHIBIT A**

**From:** [Zornberg, Lisa](#)  
**To:** [Tenreiro, Jorge](#); [Moye, Robert M.](#); [Stewart, Ladan F.](#); [Daniels, Jon](#); [Hanauer, Benjamin J.](#); [Waxman, Daphna A.](#); [Sylvester, Mark](#)  
**Cc:** [Ceresney, Andrew J.](#); [Kellogg, Michael K.](#); [Figel, Reid M.](#); [Flumenbaum, Martin](#); [Gertzman, Michael E.](#); [Linsenmayer, Robin](#); [Bunting, Kristina](#); [Solomon, Matthew](#); [nbamberger@cgsh.com](#); [Levander, Samuel](#); [Guo, Joy](#); [Gulay, Erol](#)  
**Subject:** SEC Discovery Obligations  
**Date:** Thursday, June 03, 2021 11:05:43 AM

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Mark, thank you for your letter last night. Critically, however, it omits:

-- any commitment to produce the OIEA documents by a date certain  
-- any commitment to produce internal memoranda by a date certain  
-- any commitment to search the FinHub mailbox – an obvious repository of potentially relevant evidence which the SEC is obligated to search pursuant to the Court’s April 6 Order to “[s]earch all of the relevant repositories for documents and discovery” for meetings and communications by the SEC with external third parties relating to XRP, bitcoin or ether.

Please respond to Ripple on these items today. We also encourage you to rethink your opposition to producing the SEC’s trading policies on employee ownership/trading in XRP and other cryptocurrencies (RFP 26, 27, 28).

We are available to meet and confer on these items today if helpful.

Lisa

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